

AQ 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Jackie Douglas Woodburn

Case: 2:18-mj-30259
 Judge: Unassigned,
 Filed: 05-08-2018 At 10:47 AM
 USA v. JACKIE DOUGLAS WOODBURN(CMP)
 (MLW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 1, 2016 through February 22, 2018 in the county of Macomb and elsewhere in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. § 2251(a), 18 U.S.C. § 2252A(a)(5)(B),
 and (b)(2) and 18 U.S.C. § 2422

Offense Description

Producing, attempting to produce child pornography; receipt, possession of and
 access with intent to view child pornography, and coercion and enticement.

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date:

May 8, 2018City and state: Detroit, Michigan


Complainant's signature

Special Agent Michelle Harmon, FBI

Printed name and title



Judge's signature

ANTHONY P. PATTI

UNITED STATES MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT IN SUPPORT OF APPLICATION FOR COMPLAINT AND

ARREST WARRANT

I, Michelle A. Harmon, having been first duly sworn, do hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed since October 2000. I am currently assigned to the Detroit Field Office, Macomb County Resident Agency. In connection with my official duties, I have investigated federal criminal violations related to child exploitation and the illegal production, distribution, receipt, and possession of child pornography. I have gained experience through training and everyday work relating to conducting these types of investigations. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in various forms of media including computer media. I have also received training in computer systems and networks and the investigation of computer-related crimes. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 2252A, 2422, and 2251, and I am authorized by the Attorney General to request a warrant.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for Jackie Douglas Woodburn (XX/XX/1954) for violations of 18 U.S.C. § 2422 (coercion and enticement), 18 U.S.C. § 2252A (access with intent to view and receipt of child pornography), and 18 U.S.C. § 2251(a) (producing or attempting to produce child pornography).

3. The statements contained in this affidavit are based in part on: information provided by FBI Special Agents and other law enforcement officials; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by FBI agents, analysts, and computer forensic professionals; and my experience, training and background as a Special Agent (SA) with the FBI. Because this affidavit is being submitted for the limited purpose of securing authorization for the requested arrest warrant, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish that Jackie Douglas Woodburn has violated Title 18, United States Code, Sections 2422(b), 2252A, and 2251(a).

BACKGROUND OF INVESTIGATION

4. The FBI has been conducting a lengthy investigation related to the sexual exploitation of children (specifically preteen and minor teenage girls) on a chatroom-based website. (To protect the integrity of the investigation, the website will be referred to throughout this affidavit as Website A.) Website A is a social media platform where people, using usernames of their choosing, enter chatrooms and communicate with other users in real time.

5. Investigation of Website A, which included undercover online sessions conducted by an FBI Agent, revealed Website A is primarily used by adult men seeking to sexually exploit minor teenage and preteen girls. These men pretend to be teenage boys, teenage girls, or others to entice the victims to engage in sexually explicit activity on webcam. To date, a total of more than 20 adult males have been charged with child exploitation offenses, including the production of child pornography, online enticement of minors, and conspiracy or attempt to access with intent to view child pornography, based on their conduct on Website A. Additionally, throughout the course of the investigation, the FBI identified more than 50 minor victims, with dozens more yet to be identified, who removed clothing, engaged in sexual activity, and otherwise posed for others on camera in the various chatrooms on Website A.

Statement of MV-1

6. Minor victim-1 (hereafter MV-1) is a 13 year-old girl from Texas born in 2004. During a forensic interview, MV-1 recalled an individual who went by JD Walker that she met on either Website A or another social media website sometime in 2016. MV-1 told JD Walker she was 12 years old at the time they met and JD Walker claimed to be 15 years old. JD Walker wrote sexual messages to MV-1, detailing the sexual activity he wanted her to engage in on webcam. JD walker also asked MV-1 to send him sexually explicit photos. MV-1 sent JD Walker sexually explicit images on at least two occasions.

Identification of user "JD"

7. The FBI has obtained logs of IP addresses and other information about Website A users. Review of the logs revealed that MV-1 and user JD were in a chatroom together in April 2016. On April 15, 2016, the two were in a room called "jdand[MV-1]" using MV-1's true first name. On that date, JD used IP address 68.42.175.157 to login to the chatroom and was utilizing a Macintosh computer with the Mac OS X operating system.

8. An open source query for IP address 68.42.175.157 revealed the owner of the IP address was Comcast communications. A subpoena issued to Comcast for

information pertaining to IP address 68.42.175.157 revealed the following subscriber: Jack Woodburn, 3XXX Metcalf Road, Burtchville, Michigan.

9. A search warrant was obtained for Woodburn's residence and executed on February 22, 2018. Woodburn was interviewed during the execution of the search warrant and admitted to going to Website A and portraying himself as a teenager on the website. Woodburn stated he used JD as a user name while on Website A. Woodburn further admitted to engaging in sexually explicit conversations with teenage females on Website A and masturbating as a result of the conversations.

10. Two Apple MacBook laptop computers were seized from Woodburn's residence. Woodburn stated he was the only person to use the two Apple laptops and provided the passwords for the computers. Forensic examination of Woodburn's Apple laptop computer revealed at least 70,000 Skype chat messages between Skype user name "jd windwalker" and numerous other Skype users. Review of the chat messages revealed a majority of them appeared to be between jd windwalker and teenage girls, including MV-1, and were sexually explicit in nature. Additionally, in these Skype conversations, jd windwalker encouraged the teenage girls to send him sexually explicit photos.

11. The following chat conversation between MV-1 and jd windwalker took place on April 25, 2016, beginning at approximately 10:01 PM and ending at 10:49 PM:

MV-1: Baby what do u do if ur legs r weak u don't have to answer
if ur not wanting to

jd windwalker: if your mouth is on my cock it grab you by the hair on your
head and help you suck my big cock

jd windwalker: id grab

MV-1: Babe I'm getting horny again

jd windwalker: turn you cam on

jd windwalker: yeah

jd windwalker: let me see you

jd windwalker: yes

jd windwalker: thats is take your clothes off

jd windwalker: take your clothes off

jd windwalker: put the camera down between you sexy legs and open that
pussy u for daddy

jd windwalker: pull those pussy lips apart for daddy to see

jd windwalker: yes

jd windwalker: open wide

jd windwalker: now turn that pussy on

jd windwalker: oh yes babe

jd windwalker: push two fingers in deep

jd windwalker: raise cam a little

jd windwalker: in and out...in and out

jd windwalker: faster

jd windwalker: run up to that clit and rub hard

jd windwalker: mmmm....tell daddy why you want

jd windwalker: go get something to put in that pussy....hairbrush handle
or something

jd windwalker: can't see....raise camera

jd windwalker: i want that pussy

jd windwalker: you're sooo hot

jd windwalker: im between your legs

jd windwalker: you feel my cock sliding in

jd windwalker: my lips on your neck

jd windwalker: kissing your neck as i fuck you

jd windwalker: faster

jd windwalker: harder

jd windwalker: deeper

jd windwalker: in and out

jd windwalker: in and out

The conversation continued, with Woodburn writing numerous other sexually explicit, graphic comments and giving MV-1 additional similar instructions.

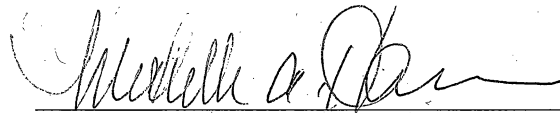
12. The following messages were also sent by jd windwalker to MV-1 on April 25, 2016 at approximately 11:55 PM:

jd windwalker: baby.....we lost electrical power because of a storm here...it just came back on....are you here?

jd windwalker: okay....i guess you left...I'm really bummed out that we lost power....YOU are so very very beautiful and sexy....when you be home tomorrow after you get home from school????? i hope so....please leave me a message here or email me and tell me what time you will be back on tomorrow....i hope its right after you get home from school...i'll be looking for you....until the....muah

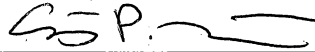
13. Review of the Skype chat session logs on Woodburn's Apple MacBook computer revealed jd windwalker was utilizing IP address 68.42.175.157 while connected to Skype during the above chat session with MV-1 on April 25, 2016. This is the same IP address JD was utilizing while engaging in chat sessions with MV-1 on Website A.

14. Based on the foregoing, there is probable cause to believe Jackie Douglas Woodburn has coerced and enticed a minor to engage in sexually explicit conduct, in violation of 18 U.S.C. § 2422; accessed child pornography with the intent to view it in violation of 18 U.S.C. § 2252A(5)(b), and produced or attempted to produce child pornography, in violation of 18 U.S.C. § 2251(a).



Special Agent Michelle Harmon
Federal Bureau of Investigation

Sworn to me this 8th day of May, 2018



Anthony P. Patti
United States Magistrate Judge